

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUN 30 1994

FCC MAIL ROOM

In the Matter of)
) CC Docket No. 92-237
Administration of the) Phase One and Two
North American Numbering Plan)

COMMENTS

Telco Planning, Inc. is happy to hereby furnish its comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.¹

SUMMARY

The comments found in the NPRM and the NOI, along with the resignation of NANPA and the action by NARUC require FCC action. The FCC should designate a course for selection of a new NANPA. The significance of the FCC's undertaking since the NARUC request has prompted great changes in the competitive use of numbering issues for the United States. At the same time, the effects in World Zone One will involve a wide array of issues, that only the FCC can manage for the United States of America telecommunications industry. Changes should occur base on the commentaries of the NOI, the NRPM, the resignation of NANPA and the original action of the NARUC. Identifying the changes necessary will is now in the hands of the FCC.

TELCO Planning suggests the focus on change be limited to replacing the current NANP staff and ownership. The FCC should direct the industry to maintain the relationship NANPA has with the FCC. The industry participants, forum process, NANPA's service to foreign nations and the funding of NANP should change. The real change to be addressed by the FCC is how other entities interact with the new NANP. Further changes to the existing NANPA and industry goals should not change. The FCC should allow the industry forum process and industry participants receive direction from the FCC's Rule-making Procedure.

The FCC should address the architecture, funding and the inter-action with other WZ1 countries. Within the architecture, the FCC should allow for competition to expand the services offered to end-users, the technology to be re-engineered for new entrants and define the ability for arbitration.

¹ FCC 94-79, released April 4, 1994.

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FUNDING

Several commentaries speculated that certain designs would cost more than others.² TELCO Planning feels that the industry benefited greatly from the expenditures of BELLCORE who has supported NANPA and WZ1. While there were clear benefits for BELLCORE, it soon became stuck with huge liability in this economy where efficiency and cost elimination are the only hope for survival. Those perceived benefits will no longer justify the cost of supporting NANPA. The fully burdened cost of NANPA will dwarf the reported costs of BELLCORE because, A) transition of staff, B) industries dire need for portability and wireless numbering, C) integration of new technology and learning curves, and D) the cost of funding and developing the business opportunity for the successful bidder.

TELCO Planning's original comments did not draw concurring parties on the concept of end-user's payment for numbering resources (except for the few resource types administered for network routing). TELCO Planning still believes when end-users pay for the resources conservation, efficient use and portability between network owners will result.

Currently, most of the complaints by carriers about NANPA are their frustration in receiving allocations of numbers, or wresting the numbers held in reserve or numbers not assigned to a network provider. The current number administration basis assigning number ranges to more local administrators who dole-out a finer granulation of numbers. Incumbent networks cannot get numbers, new entrants cannot get numbers, and if expanded CICs are not available existing administrators may not be able to get inter-exchange network codes for their entry into the inter-state/inter-LATA market place.

By having end-users control numbering resources, they will move between networks, the industry will incorporate some very radical/expensive changes, that can be recoup only by the consumer's ability and willingness to pay. The process of network providers providing services based on LATA boundaries and not passing information between networks will start to disappear. New entrants, acquiring companies that have access to local markets will team-up with inter-LATA networks for joint ventures. Local networks seeking CIC codes in a non-integrated expanded format, may need to acquire or team-up with current three digits CIC owners.

The other segment of funding is collection from end-users. Collection should come about in much the same manner as the Network Access/Common Carrier Line charge. This charge applies to each access line, whether long distance access is requested or not. A charge for numbering should only occur on those lines that use a numbering resource. The amount collected should allow for the management, administration, development and profit of the neutral third party.

A carrier that uses a network address number, reserves or has unassigned numbers should pay different rates than the end-users. Network addresses are a volume sensitive component and should be charged accordingly. Two tiers of prices should be developed. One for reserved and another for unassigned numbers. Unassigned

² BELLCOREs' funding comments allude to an increased cost.

numbers are those that exist because of the current shortly gone j(6-10 years) geographic or non-portable numbers. Within the allocated (NPAs) numbers, unassigned numbers represent almost 50% then, in addition to those numbers you have telephone companies issuing when Terminals³ will suffice.

REQUEST FOR PROPOSAL

TELCO Planning believes that the architecture of the numbering resources management for WZ1 is in the contributions provided by this NPRM. TELCO Planning believes the ATIS committee INC, should develop the criteria and the RFP announcement, by September 1, 1994. The INC should develop it's RFP using the resulting FCC rules.

SELECTION OF BIDDER

The selection of the NANPA from respondents to the RFP should be by the FCC, without further comments from the industry.

ARCHITECTURE OF WZ1 ADMINISTRATION

Southwestern Bells' attachment is a low granular representation of what TELCO Planning would like to see the shape of NANPAs relationship with the industry. The MCI attachment to the NPRM comments cycle and FNF material referenced by many, provides a more in-depth explanation of the TELCO Planning recommended architecture. The FCC should seek agreement from other WZ1 participants on Southwestern, and MCI' proposed integration of all parties, using discussions from the FNF. Please note that the FNF did not, nor would TELCO Planning expect that the parties could agree on the in-depth or complete NANPA plan, therefore the FCC should rule on the proposals upon concurrence from foreign nations.

PRESERVATION OF 1+ TOLL INDICATOR

The amounts of programming end-users face by conversion from traditional NPA is an extreme burden. PBXs and businesses seem to be the most concern but little if no provision has develop for people who will not have an automated table to manage routing decisions. The only condition worse than taking away the toll indicator is not making the decision to keep the 1+ indicator when the FCC makes its ruling.

INTRA-LATA PRESUBSCRIPTION

TELCO Planning believes market share is a concern, although the MFJ held carriers should enter into inter-LATA transport, expeditiously. Some inter-LATA entry requirements are worth considering but numbering and technologies are not the issues. Bell Atlantic and GTE address some of the legal considerations and addressed in other proceedings and forums outside the FCC.

³Terminals are numbers that are behind pilot and billing numbers for large customers. A Pilot number is the one familiar to end-users. The billing number is the number that accounting firms use to reconcile telephone bills. In large installations, some telcos assign the additional numbers as terminal addresses, other telcos assign a telephone number.

TRANSITION OF CO CODE ADMINISTRATION

TELCO Planning believes that current CO code guideline is a change but no-longer new. CO code administration previously and in the future will not be complex⁴. The carriers have tackled much tougher problems very successfully and CO code administration is new, not very complex. The concern expressed over the complexity is of concern though. Those expressing concern must have huge problems with some of the tougher issues. The complex issue is proper positioning for competition.

CIC CODE EXPANSION

While there is a lot of discussion of CIC shortages, the abuse through acquisition and mergers is somewhat misleading. Those acquired CIC codes cost too much to consolidate into one therefore reclamation is not taking place. Experience shows prudent owners might need one more in the future, and the half a million dollar expense for regional conversion is never taken into account in acquisition analysis. The LEC needs to recoup the system translation change cost, just as the acquiring carrier does internally. The carrier while absorbing their internal cost, has not been happy with the charges assessed by the many LECs. Instead, the inter-LATA network owners simply manage trunks' groups with many CICs from the same intra-LATA network.

Regarding time frames for CIC expansion, TELCO Planning is aware of two reasons that prevent a short "permissive period." The first is that many large inter-LATA network owners cannot recoup the cost of paying for translations to interconnecting networks. The second phenomenon is that the new holders of expanded CICs will need to pay incumbent network operators for the development of their systems that currently are not compatible with 4 digit or expanded CICs. There does not seem to be any incumbent LEC or IXC who is advertising they can process through all of their systems, an expanded CIC.

In closing, the industry has commented through this proceeding and the FNF. Representatives of new entrants and end-users have commented. The FCC must take the comments and proceed with a set of rules that instruct the industry on its new relationship with the NANP.

⁴BELL ATLANTIC, SOUTHWESTERN BELL, CBIS, GTE and others have referred to the monumental task of CO code administration. This task is monumental, but not difficult.